## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Kevin Alton Walton, Debtor

Case No. 24-02317-JAW

CHAPTER 13

#### **NOTICE**

Debtor has filed papers with the court to be Employ Counsel.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to Debtor's attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Application.

Date: May 9, 2025. Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767 Jackson, MS 39236 601-500-5533

trollins@therollinsfirm.com

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Kevin Alton Walton, Debtor

Case No. 24-02317-JAW

CHAPTER 12

#### APPLICATION OF DEBTOR TO EMPLOY COUNSEL

COMES NOW, Kevin Alton Walton (the "Debtor"), by and through the undersigned counsel, pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014, and hereby respectfully moves this Court to approve the employment of Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC as attorney for the Debtor. In support of this application, the Debtor states as follows:

- On October 4, 2024, the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Mississippi.
- 2. The Debtor wishes to employ Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC as its attorney once the case is converted to chapter 12.
- The professional services to be rendered by Mr. Rollins include, but are not limited to, advising the Debtor on all matters which are now anticipated to arise in the functioning of this proceeding.
- 4. Mr. Rollins is competent to represent the Debtor in all matters which are now anticipated to arise in the functioning of this proceeding.
- 5. To the best of the Debtor's knowledge, Mr. Rollins has no adverse interest to the Debtor or the estate and has no connection with the creditors or other parties in interest or their respective attorneys.
- 6. The proposed terms of employment for Mr. Rollins are as follows:
  - a. Mr. Rollins' hourly rate is \$360 per hour;
  - b. Paralegals will bill at \$155 per hour;

c. Legal assistants will bill at \$100 per hour;

7. Any retainer received will be applied against the fees and expenses incurred before any

additional fees will be sought.

8. The Bankruptcy Code allows for the employment of professionals, including attorneys, on

reasonable terms and conditions, subject to court approval. 11 U.S.C. § 327(a)

9. The proposed terms of employment, including the hourly rates, are reasonable and in line

with prevailing market rates for attorneys with similar experience and expertise in bankruptcy

matters.

10. The employment of Mr. Rollins is necessary and in the best interests of the Debtor and the

estate to ensure proper representation throughout the Chapter 12 proceedings.

WHEREFORE, the Debtor respectfully requests that this Court enter an order:

A. Authorizing the employment of Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC

as attorney for the Debtor;

B. Approving the terms of employment as set forth in this application; and

C. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

Kevin Alton Walton, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

Its Attorney

Thomas C. Rollins, Jr. (MSBN 103469) The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 601-500-5533 trollins@therollinsfirm.com

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Kevin Alton Walton, Debtor

Case No. 24-02317-JAW CHAPTER 13

### **AFFIDAVIT OF ATTORNEY**

STATE OF MISSISSIPPI

#### **COUNTY OF HINDS**

- I, Thomas C. Rollins, Jr., being duly sworn, hereby depose and say:
- 1. I am an attorney duly admitted to practice law in the State of Mississippi and before the United States District Court for the Southern District of Mississippi. I am a partner of The Rollins Law Firm, PLLC (the "Firm"), which maintains its principal office at 40 Northtown Drive, Jackson MS 39211.
- 2. This Affidavit is submitted pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014(a) in support of the application of Kevin Alton Walton (the "Debtor") for an order approving the employment of myself and the Firm as attorneys for the Debtor in the above-captioned Chapter 13 case (the "Case"). This Case was filed on October 4, 2024, in the United States Bankruptcy Court for the Southern District of Mississippi (the "Court").
- 3. To the best of my knowledge, I do not represent any interest adverse to the Debtor or its estate in the matters upon which I am to be engaged. I am a "disinterested person" as that term is defined in 11 U.S.C. § 101(14). The Firm, its partners, of counsel, and associates:
  - a. are not creditors, equity security holders, or insiders of the Debtor;
  - b. are not and were not, within two years before the Petition Date, directors, officers, or employees of the Debtor; and
  - c. do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

FURTHER, AFFIANT SAITH NOT.

Dated this the $9^{+}$ day of $0$ , $0$ , $0$ , $0$ , $0$ , $0$ , $0$ , $0$ ,	
By: Thomas	
SWORN TO AND SUBSCRIBED BEFORE ME, this the $\frac{9}{20}$	day of May

OF MISS

ID# 494098

SHATON ANDREWS

Commission Expires

Jan. 7, 2029

**NOTARY PUBLIC** 

### **CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on May 12, 2025, to:

By USPS First Class Mail:

Kevin Alton Walton 318 Shady Lane Vicksburg, MS 39180

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI	
5	SOUTHERN DISTRICT OF MISSISSIFFI	
6	IN RE:  CASE NO: 24-02317  KEVIN ALTON WALTON  DECLARATION OF MAILING	
7	CERTIFICATE OF SERVICE	
8	Chapter: 13	
9		
10		
11	Notice and Application to Employ Counsel	
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with	
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.	
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.	
21		
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been	
23	served electronically with the documents described herein per the ECF/PACER system.  DATED: 5/12/2025	
24	/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.	
25	The Rollins Law Firm	
26	702 West Pine St Hattiesburg, MS 39401	
27	601 500 5533 trollins@therollinsfirm.com	
28		

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	24-02317-JAW Dkt 73 Filed 05/14/25 Entered 05/14/25 11:08:53 Page 7 of 9
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3	UNITED STATES BANKRUPTCY COURT
4	SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE:   CASE NO: 24-02317
6	KEVIN ALTON WALTON CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING  Chapter: 13
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11	On 5/12/2025, a copy of the following documents, described below,  Notice and Application to Employ Counsel
12	Exhibit A
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14	
15	
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19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.
23	DATED: 5/12/2025
24	
25	Wilm hal
26	Miles Wood  BK Attorney Services, LLC
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
28	The Rollins Law Firm 702 West Pine St
	Hattiesburg, MS 39401

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USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

DEBTOR

KEVIN ALTON WALTON 318 SHADY LANE VICKSBURG MS 39180 CASE INFO

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 24-02317 SOUTHERN DISTRICT OF MISSISSIPPI MON MAY 12 12-19-56 PST 2025 ALLY CAPITAL CO AIS PORTFOLIO SERVICES LLC 4515 N SANTA FE AVE DEPT APS

EVELUDE

JOHN DEERE CONSTRUCTION FORESTRY COMPANY
CO LES ALVIS
PO BOX 1836
207 COURT STREET
TUPELO MS 38804-3907

US SMALL BUSINESS 332 S MICHIGAN AVE STE 600 CHICAGO IL 60604-4318 US DANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET

OKLAHOMA CITY OK 73118-7901

JACKSON MS 39201-5036

1STHERITAG 1651 ST MARY STREET THIBODAUX LA 70301-6491 ACCEPTANCENOW
ATTN BANKRUPTCY
5501 HEADQUARTERS DRIVE
PLANO TX 75024-5837

ADVANCED RECOVERY SYSTEMS PO BOX 321472 FLOWOOD MS 39232-1472

EXCLUDE

ALLY CAPITAL AIS PORTFOLIO SERVICES LLC 4515 N SANTA FE AVE DEPT APS OKLAHOMA CITY OK 73118-7901

SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

ALLY FINANCIAL ATTN BANKRUPTCY PO BOX 380901

BLOOMINGTON MN 55438-0901

EXCLUDE

(P) AMERICAN HONDA FINANCE P O BOX 168088 IRVING TX 75016-8088 (D) (P) AMERICAN HONDA FINANCE P O BOX 168088 IRVING TX 75016 8088 CAPITAL ONE
ATTN BNAKRUPTCY
PO BOX 30285

SALT LAKE CITY UT 84130-0285

CAPITAL ONE NA BY AIS INFOSOURCE LP AS AGENT 4515 N SANTA FE AVE OKLAHOMA CITY OK 73118-7901 CHASE AUTO FINANCE ATTN BANKRUPTCY PO BOX 901076 FORT WORTH TX 76101-2076 DEPARTMENT OF TREASURY IRS PO BOX 7346 PHILADELPHIA PA 19101-7346

FIRST HERITAGE 2480 S FRONTAGE ROAD VICKSBURG MS 39180-5251 FORA FINANCIAL 1385 BROADWAY 15TH FL NEW YORK NY 10018-6015 FORA FINANCIAL ASSET SECURITIZATION 2021 LL CO AUBREY THRASHER LLC

3050 PEACHTREE ROAD NW SUITE 240 ATLANTA GA 30305-2212

(P)INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346 IRS
CO US ATTORNEY
501 E COURT STE 4430
JACKSON MS 39201-5025

JPMORGAN CHASE BANK NA
NATIONAL BANKRUPTCY DEPARTMENT
PO BOX 29505 AZ1-5757
PHOENIX AZ 85038-9505

JOHN DEERE CONSTRUCTION FORESTRY COMPANY
CO LES ALVIS
PO BOX 1836
TUPELO MS 38802-1836

(P)DEERE CREDIT SERVICES INC ATTN LITIGATION RECOVERY DEPARTMENT PO BOX 6600 JOHNSTON IA 50131-6600 KUBOTA CREDIT CORP USA ATTN BANKRUPTCY PO BOX 2048 GRAPEVINE TX 76099

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LES ALVIS ESQ RILEY CALDWELL CORK ALVIS PA POST OFFICE BOX 608
FOR JOHN DEERE CONSTRUCTION FORESTRY C PORT GIBSON MS 39150-0608 P O BOX 1836 TUPELO MS 38802-1836

RIVER HILLS BANK

RIVER HLS BK POB 608 PORT GIBSON MS 39150-0608

SBA US ATTORNEY 501 E COURT ST STE 44 JACKSON MS 39201-5022

SBA CO US AG 950 PENNSYLVANIA AVENW WASHINGTON DC 20530-0009

SMALL BUSINESS ADMINISTRATION 233 PEACHTREE ST NE STE 300 ATLANTA GA 30303-1553

TRANSWORLD SYSTEM INC ATTN BANKRUPTCY PO BOX 15520 WILMINGTON DE 19850-5520 (P)U S SMALL BUSINESS ADMINISTRATION ATTN BK NOTICES 332 S MICHIGAN AVE SUITE 600 CHICAGO IL 60604-4318

SUITE 6-430 JACKSON MS

WELLS FARGOFURNITURE MARKETING GROUP ATTN BANKRUPTCY PO BOX 10438 MAC F8235-02F DES MOINES IA 50306-0438

ALLISON W KILLEBREW MCRANEY SANFORD KILLEBREW PLLC PO DRAWER 1397 CLINTON MS 39060-1397

GEORGE ADAM SANFORD MCRANEY SANFORD KILLEBREW PLLC POST OFFICE DRAWER 1397 CLINTON MS 39060-1397

BOX 4476

DEBTOR

KEVIN ALTON WALTON 318 SHADY LANE VICKSBURG MS 39180-5650